

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**WOLLMUTH MAHER & DEUTSCH LLP**

Paul R. DeFilippo, Esq.  
500 Fifth Avenue  
New York, New York 10110  
Telephone: (212) 382-3300  
Facsimile: (212) 382-0050  
pdefilippo@wmd-law.com

**JONES DAY**

Gregory M. Gordon, Esq.  
Brad B. Erens, Esq.  
Dan B. Prieto, Esq.  
Amanda Rush, Esq.  
2727 N. Harwood Street  
Dallas, Texas 75201  
Telephone: (214) 220-3939  
Facsimile: (214) 969-5100  
gmgordon@jonesday.com  
bberens@jonesday.com  
dbprieto@jonesday.com  
asrush@jonesday.com  
(Admitted *pro hac vice*)

*PROPOSED ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**NOTICE OF DEBTOR'S MOTION FOR AN ORDER  
(I) SCHEDULING HEARING ON APPROVAL OF DISCLOSURE  
STATEMENT; (II) ESTABLISHING DISCLOSURE STATEMENT  
OBJECTION DEADLINE; AND (III) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that, on the date set by the Court pursuant to a proposed Order Shortening Time ("OST") and Application submitted herewith, LTL Management LLC, the above-captioned debtor (the "Debtor") by and through its counsel, shall move (the "Motion") before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order, pursuant to section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9006, for the entry of an order (a) scheduling the hearing (the “Disclosure Statement Hearing”) to consider the adequacy of the Debtor’s proposed disclosure statement (the “Disclosure Statement”) concerning the Debtor’s Plan<sup>2</sup>, which the Debtor anticipates filing on or around May 14, 2023, for **June 19, 2023, at 10:00 a.m. (prevailing Eastern Time)**, (b) shortening the notice period for objections to approval of the Disclosure Statement by seven (7) days, from a twenty-eight day period to a twenty-one day period, (c) establishing the deadline for objections to approval of the Disclosure Statement and any other objections to any other relief sought in the Disclosure Statement Motion for **June 5, 2023, at 4:00 p.m. (prevailing Eastern Time)**, and (d) establishing the deadline for responses in support of approval of the Disclosure Statement and any other relief sought in the Disclosure Statement Motion for **June 15, 2023**.

**PLEASE TAKE FURTHER NOTICE** that, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor’s undersigned counsel, (b) proposed counsel to the Official Committee of Talc Claimants, (c) counsel to the Debtor’s non-debtor affiliates, Johnson & Johnson Holdco (NA) Inc. and Johnson & Johnson, (d) the proposed legal representative for future talc claimants and her counsel, (e) the Office of the United States Trustee for the District of New Jersey, and (f) any other party entitled to notice in accordance with any OST entered by the Court.

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<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

**PLEASE TAKE FURTHER NOTICE** that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the requested relief may be granted without a hearing.

Dated: April 19, 2023

**WOLLMUTH MAHER & DEUTSCH LLP**

/s/ Paul R. DeFilippo

Paul R. DeFilippo, Esq.

James N. Lawlor, Esq.

Joseph F. Pacelli, Esq. (admitted *pro hac vice*)

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Facsimile: (212) 382-0050

pdefilippo@wmd-law.com

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